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21 UNITED STATES DISTRICT COURT

22 DISTRICT OF ARIZONA

23 In Re Bard IVC Filters Products
24 Liability Litigation

25 No. MD-15-02641-PHX-DGC

26 **MOTION TO FILE UNDER SEAL**

27 **(Filed *Ex Parte*)**

28 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
1 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
2 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
3 Local Civil Rule 5.6 for leave to file under seal Exhibits A to Plaintiffs' Notice of
4 Errata ("Exhibit").

5 The Exhibit contains confidential financial information relating to all Participating
6 Counsel as defined in Case Management Order No. 6 (Doc. 372). Furthermore, as the
7 Court is undoubtedly aware, all filings related to the Common Benefit Fee and Cost
8 Committee have been filed under seal in this litigation. Accordingly, good cause exists
9 for sealing the Exhibit.

1 RESPECTFULLY SUBMITTED this 11th day of March 2021.
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4 BEUS GILBERT MCGRODER PLLC
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7 By:s/ Mark S. O'Connor
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31 Committee*

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine